



# DEMOCRATIC PARTY OF WISCONSIN

222 W. Washington Ave., Suite 150, Madison, WI 53703 • www.wisdems.org  
Phone: (608) 255-5172 • Fax: (608) 255-8919

April 19, 2004

Lawrence Norton  
General Counsel, Federal Election Commission  
999 E Street  
Washington, D.C. 20463

MUR #

5446

2004 APR 26 A 11:52

RECEIVED  
FEDERAL ELECTION  
COMMISSION  
OFFICE OF GENERAL  
COUNSEL

Dear Mr. Norton,

I am writing to request an investigation into the campaign activities of Wisconsin State Senator Robert Welch, an announced candidate for the United States Senate. Sen. Welch has repeatedly spent funds from his nonfederal campaign account for the purpose of benefiting his federal campaign, in violation of federal law.

These new violations are in addition to the violation that was the subject of a previous complaint filed by the Democratic Party of Wisconsin on August 7, 2003. In that instance, Sen. Welch also improperly used nonfederal campaign funds to benefit his federal campaign, purchasing radio advertisements outside his state Senate district shortly before he filed his FEC Statement of Candidacy for the United States Senate. See FEC Matter Under Review 5387.

Sen. Welch's actions are a clear violation of the Federal Election Campaign Act ("FECA or "the Act"), as amended by the Bipartisan Campaign Reform Act, specifically the provisions of the Act that govern the use of non-federal or "soft" money in federal campaigns. The following provisions of FECA are at issue in this complaint:

2 U.S.C. § 441i(e)(1) states that a candidate for Federal office "shall not-- (A)... spend funds in connection with an election for Federal office ... unless the funds are subject to the limitations, prohibitions, and reporting requirements of this Act."

2 U.S.C. § 441i(f)(1) states that an "individual holding State or local office... may not spend any funds for a communication described in ... 2 U.S.C. § 431(20)(A)(iii) unless the funds are subject to the limitations, prohibitions, and reporting requirements of the Act."

2 U.S.C. § 441f states that "No person shall make a contribution in the name of another person or knowingly permit his name to be used to effect such a contribution and no person shall knowingly accept a contribution made by one person in the name of another person."

2 U.S.C. § 431(20)(A)(iii) defines a "communication" referred to above as "a public communication that refers to a **clearly identified** candidate for Federal office... and that **promotes or supports** a candidate for that office...(regardless of whether the communication expressly advocates a vote for or against the candidate)."

11 CFR § 110.3 Contribution limitations for affiliated committees and political party committees; **Transfers** (2 U.S.C. 441a(a)(5), 441a(a)(4)).  
\* \* \* \*

(d) *Transfers from nonfederal to federal campaigns.* **Transfers** of funds or assets from a candidate's campaign committee or account for a nonfederal election to his or her principal campaign committee or other authorized committee for a federal election are prohibited.

On 7/21/03, Sen. Welch signed his FEC Statement of Candidacy for his U.S. Senate campaign. Wisconsin law does not permit a candidate to run simultaneously for state and federal office. After 7/21/03, Sen. Welch should not have been actively raising funds for his nonfederal campaign or spending funds from that account in connection with his federal election. But according to his 2003 state campaign finance reports, Sen. Welch aggressively spent funds from his nonfederal campaign throughout 2003, particularly after he declared his federal candidacy. Sen. Welch spent more than \$88,000 in 2003, including over \$73,000 between July 1 and December 31, 2003.

As shown in the following table, the \$73,000 that Sen. Welch spent in the last six months of 2003 (a time period where by his own declaration on July 21, 2003, he was not running for any state office) represents a considerable increase from his spending in the 2000 election cycle, a year when he was running for reelection to the Wisconsin State Senate.

**Citizens for Welch (State Senate campaign account):**

<b>Year Total disb. total raised</b>		
2003	\$88,489.03	\$45,498.95
7/1-12/31/03	<b>\$73,204.99</b>	<b>\$2,128.20</b>
2002	\$49,273.12	\$47,627.15
2001	\$35,340.51	\$41,273.53
<b>2000</b>	<b>\$49,428.19</b>	<b>\$79,990.63</b>
1999	\$23,426.31	\$38,843.25
1998	\$16,844.38	\$37,645.00
1997	\$19,963.27	\$8,453.00

**(Bold = State Senate election year)**

As outlined more specifically below, Sen. Welch appears to be using his nonfederal account to make expenditures to benefit his federal campaign. These expenditures from his nonfederal account violate the prohibition in 441i(e)(1), which applies to spending in

connection with a federal election, including any federal election activity. Simply put, the expenditures made by Sen. Welch's nonfederal account amount to "soft money" contributions to his federal campaign and are illegal.

**Illegal transfer of funds from nonfederal account to federal account**

On September 29, 2003 Sen. Welch's nonfederal campaign wrote a \$1,000 check to his federal campaign. This is a clear violation of 11 CFR 110.3(d).

**Gateway Ventures**

Sen. Welch's nonfederal campaign paid Phil Prange's fundraising consulting firm, Gateway Ventures, \$33,429.07 in two payments, July 14 and 24, 2003. The purpose of these expenditures is listed as "Finance Consulting," and the reports indicate that the payments to Gateway were for services rendered from September 2002 to June 2003. But the fees paid to Gateway are obviously excessive for any work that might have been done for his State Senate campaign. During that period, September 1, 2002 to June 30, 2003, Citizens for Welch, Sen. Welch's nonfederal campaign committee, raised a total of only \$66,944.39. In addition to the fees it spent on Gateway, Citizens for Welch spent at least \$5,387.29 in other fundraising expenses. Sen. Welch specifically announced in a press release on 8/25/03 that Phil Prange had joined his federal campaign team as a fundraiser. (See attached Welch for Wisconsin press release.)

If the statement that the payments to Gateway were for services rendered between September 2002 to June 2003 is determined to be false, that would strongly suggest that Sen. Welch was aware that he could not pay for Gateway's services to his federal campaign with nonfederal campaign funds and therefore knowingly violated the law.

**Nonfederal payments to and federal contribution from Jeanne Welch**

On July 31, 2003, just eight days after he filed his statement of federal candidacy with the FEC, Welch paid his wife Jeanne Welch \$6,500 for purposes listed on his 2003 Year End nonfederal campaign finance report (see report attached) as "office management and consulting." Furthermore, Sen. Welch's Quarterly FEC report for the period ending on September 30, 2003, shows that on the last day of the reporting period, Jeanne Welch contributed \$4,000, the maximum permitted by law, to her husband's federal campaign. There is no evidence that Jeanne Welch had ever previously contributed to her husband's federal or nonfederal campaigns over the last ten years.

Jeanne Welch had been paid by Citizens for Welch for bookkeeping on 4 other occasions, all for far less money: 11/11/96 (\$1,200); 12/10/98 (\$500); 11/4/01 (\$1,500); and 11/8/02 (\$1,200). There is no indication why Citizens for Welch, an essentially dormant nonfederal campaign account winding down as Sen. Welch began his federal candidacy, would require a dramatically higher level of services from Jeanne Welch. Measuring the level of activity by the size of the Citizens for Welch campaign reports and the previous payments made to Jeanne Welch for similar services, \$6,500 appears to be excessive.

If the nonfederal campaign paid \$6,500 to Jeanne Welch for services she did not actually perform and Mrs. Welch used this payment to contribute to Sen. Welch's federal

campaign, two violations of law occurred. First, the nonfederal campaign made a contribution in the name of another in violation of 2 U.S.C. § 441f. Second, once again Welch's nonfederal campaign made a contribution to his federal campaign, which is prohibited in any amount under any circumstances. The contribution of nonfederal money through Mrs. Welch, would also indicate a willful and knowing violation of the law. It would mean that Sen. Welch recognized that his nonfederal campaign cannot transfer money to his federal campaign and nonetheless authorized the laundering of nonfederal money through a fraudulent payment to his wife.

### **Mailing Lists**

Citizens for Welch, Sen. Welch's nonfederal account, paid \$9,000 on August 29, 2003 for mailing lists from the Republican Party of Wisconsin (RPW). By then Sen. Welch was supposedly winding down his nonfederal campaign, having declared his federal candidacy over a month earlier. He had no need to spend any money on mailing lists for that campaign.

If his federal campaign used the list, it would be required to pay fair market value for the list, or the full \$9,000, to his nonfederal campaign or the RPW. The nonfederal campaign cannot provide an in-kind contribution of any value to the federal campaign. The attached letter that begins "Dear Fellow Wisconsin Republican" is further evidence that Sen. Welch used this mailing list from the RPW to send a solicitation regarding his federal campaign. In the letter, Sen. Welch uses the terms "conservative Republican," "Wisconsin Republican," or "conservative Wisconsin Republican" no less than 9 times. If it were not certain that the generic recipient of this letter was a Republican from Wisconsin, Sen. Welch would have used different language. This is compelling evidence suggesting Sen. Welch used a mailing list he purchased from the Republican Party of Wisconsin with nonfederal funds to solicit donors to his federal campaign. (See attached "Dear Fellow Wisconsin Republican" Welch for Wisconsin letter.)

**Foxfire Fundraiser:** On August 4, 2003, Welch paid \$342.45 from his nonfederal campaign account for fundraising expenses to Foxfire Golf Club. Welch held a federal fundraiser at Foxfire on 9/20/03. His federal campaign did not report any disbursements to Foxfire. Welch did not raise any funds for his nonfederal campaign after July 15, 2003. Welch's federal campaign account did report \$31,150 in contributions received on September 19 and 22, 2003 on his federal report indicating that he likely received contributions to his federal account at the Foxfire fundraiser. If Sen. Welch paid for this federal event with money from his nonfederal campaign, he violated the law.

### **Other questionable disbursements**

Other disbursements from Sen. Welch's nonfederal campaign that raise serious questions of whether federal law has been violated include \$2,972.50 in travel expenses during the period in which he was actively promoting his federal candidacy, from April-June, 2003. There are no further details in the nonfederal campaign reports, but this amount appears to be excessive for an essentially dormant campaign.

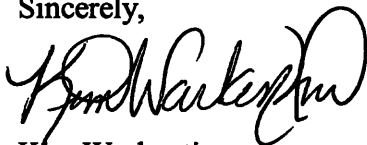
I respectfully request that you conduct an investigation into this matter and determine if federal law has been violated. In particular:

1. Did Sen. Welch's transfer of \$1,000 directly from his nonfederal campaign account to his federal account violate FEC rules?
2. Did Sen. Welch's payment for federal fundraising consulting, mailing lists, event, and other costs from his nonfederal account violate federal law?
3. Did Jeanne Welch's contribution of \$4,000 to Sen. Welch's federal account, after her receipt of \$6,500 from his nonfederal account, represent a contribution in the name of another, and a transfer of funds from a nonfederal campaign account to a federal campaign account, in violation of federal law?
4. Did Sen. Welch's attempts to conceal his actions, after receiving notice of similar violations contained in the complaint commencing Matter Under Review 5387, constitute willful violations subject to enhanced penalties under 2 U.S.C. § 437g(d)?

I request that the Commission determine if Sen. Welch should be sanctioned or fined by the Federal Election Commission for this activity and refer any potential criminal violations of FECA to the Department of Justice for its review and possible prosecution. In addition, I request that the Federal Election Commission order Sen. Welch to cease and desist transferring or disbursing funds from his nonfederal account to benefit his federal campaign.

Thank you for your consideration of this matter.

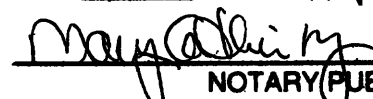
Sincerely,



Kim Warkentin  
Executive Director  
Democratic Party of Wisconsin

Signed and sworn to before me.

STATE OF WISCONSIN COUNTY OF DANE  
SUBSCRIBED AND SWORN TO BEFORE ME  
THIS 14th DAY OF April, 2004.

  
NOTARY PUBLIC  
My commission expires 8/6/04

HAND DELIVERED

**CAMPAIGN FINANCE REPORT  
STATE OF WISCONSIN**

RECEIVED

04 JAN 30 AM 8:27

STATE OF WISCONSIN  
ELECTIONS BOARD

Is this report an Amended NO

**COMMITTEE IDENTIFICATION**

Name of Committee Citizens for Welch  
Address P O Box 523  
City, State, ZIP Redgranite, WI 54970

OFFICE USE  
WSEB # ID

DM  
101787

Please check if address is different than previously reported

NAME OF REPORT ~~July 03 Continuing~~ Pre-Primary 20 Jan 2004 Spring Fall  
~~July 2002 Continuing~~ Pre-election 20 Spring Fall

**SUMMARY OF RECEIPTS AND DISBURSEMENTS**

**1. RECEIPTS**

	Column A This Period	Column B YTD	Audited Total Office Use Only
A Contributions including Loans from Individuals	\$ 1,528.20	\$ 43,323 95	
B Contributions from Committees (Transfers-In)	\$ 600.00	\$ 2,175 00	
C Other Income and Commercial Loans	\$ -		
<b>TOTAL RECEIPTS</b> (Add totals from 1A, 1B, and 1C)	\$ 2,128.20	\$ 45,498 95	

**2. DISBURSEMENTS**

A Gross Expenditures	\$ 73,204 99	\$ 88,489 03	
B Contributions to Committees (Transfers-Out)	\$ -		
<b>TOTAL DISBURSEMENTS</b> (Add totals from 2A and 2B)	\$ 73,204 99	\$ 88,489 03	

**CASH SUMMARY**

Cash Balance at Beginning of Report	\$ 99,147 24		
Total Receipts	\$ 2,128.20		
Subtotal	\$ 101,275 44		
Total Disbursements	\$ 73,204 99		
<b>CASH BALANCE AT END OF REPORT</b>	\$ 28,070 45		
<b>INCURRED OBLIGATIONS</b> (at close of period)	\$ -		
<b>LOANS</b> (at close of period)	\$ -		

I certify that I have examined this report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Candidate or Treasurer

Robert Welch

Signature of Candidate or Treasurer

*[Signature]*

Date

9/29/04

Daytime Phone

608-266-0751

NOTE The information on this form is required by ss 11 06, 11 20, Wis Stats

Failure to provide this information may subject you to the penalties of ss 11 60, 11 62, Wisconsin Stats

# Citizens for Welch

## SCHEDULE 1-A Contributions Including Loans from Individuals

IN-KIN D	CON DUIT	DATE	LAST	FIRST	ADDRESS	CITY	ST	ZIP	OCCUPATION	EMPLOYER NAME	EMPLOYER ADDRESS	AMOUNT	YTD
X													
	X	07/01/03	Connelly	James	9305 N Valley Hill Road	Milwaukee	WI	53217	Attorney	Foley & Lardner	800 W. Bradley Road; Milwaukee, WI 53217	\$ 378.20	\$ 378.20
	X	07/01/03	Gundersen	John	4200 Janick Circle No.	Stevens Point	WI	54481				\$ 50.00	\$ 50.00
	X	07/01/03	Klingenberg	Dean	6128 County A	Amherst	WI	54406				\$ 50.00	\$ 50.00
	X	07/01/03	Goetz	Jim Jr	4130 Verth Avenue	Madison	WI	53704	Businessman	Goetz Industries	190/94 & Highway 78; Portage, WI 53901	\$ 100.00	\$ 100.00
	X	07/01/03	Wolf	Edward	605A Kettle Moraine Drive S	Slinger	WI	53086	Businessman	EH Wolf & Sons, Inc	414 Kettle Moraine Drive S, Slinger, WI 53086	\$ 100.00	\$ 100.00
	X	07/01/03	Lisowe	Ray	P O Box 176	Stockbridge	WI	53088	Businessman	Lisowe Oil, Inc	160 Sandy Beach Road; Lake Mills, WI 53551	\$ 50.00	\$ 50.00
	X	07/01/03	Bytof	Joyce	2229 Sunrise Drive	Appleton	WI	54914	Realtor	Coldwell Banker The R.E. Group		\$ 100.00	\$ 100.00
	X	07/01/03	Lee	Daniel	W8904 Dupless Road	Portage	WI	53901	Realtor	First Weber Group Inc--West Towne		\$ 100.00	\$ 100.00
	X	07/01/03	Mulleady	James	P O Box 679	Minocqua	WI	54548	Realtor	Coldwell Banker Mulleady-MIN		\$ 100.00	\$ 100.00
	X	07/01/03	Enright	Ann	1320 Scenic Drive	Kewaskum	WI	53040	Realtor	RE/MAX United--Cedarburg		\$ 100.00	\$ 100.00





[illegible]

SCHEDULE 2-A

# Citizens for Welch

## Gross Expenditures

IN-KIND	DATE	NAME	ADDRESS	CITY	ST	ZIP	PURPOSE	AMOUNT
	07/24/03	Gateway Ventures	14 W Mifflin Street	Madison	WI	53703	Finance Consulting 9/1/02-6/30/03	\$ 29,000 00
	07/11/03	M&I Bank	P O Box 98	Westfield	WI	53984	Fair Ad	\$ 389 40
	07/13/03	Grecian Inn	14315 Capital Drive	Brookfield	WI	53005	Campaign Dinner	\$ 85 00
	07/14/03	C S A	P O Box 96	Wautoma	WI	54982	Cell Phone Services	\$ 392 39
	07/14/03	Gateway Ventures	14 W. Mifflin Street	Madison	WI	53703	Expenses 01/01/03-06/01/03	\$ 4,429.07
	07/14/03	US Cellular	P O Box 0203	Palatine	IL	60055	Cell Phone Expenses	\$ 1,975 84
	07/14/03	Juniper Bank Master Card	P O Box 13337	Philadelphia	PA	19101	Master Card for Campaign Event Expenses	\$ 862 77
	10/17/03	Robert Welch	P O Box 523	Redgranite	WI	54970	Reimburse travel expenses	\$ 500 00
	11/14/03	The Other Other Club	P O Box 1482	Madison	WI	53701	Ticket	\$ 500 00
	09/12/03	Mobil	P O Box 4773	Carol Stream	IL	60197	Candidate gas	\$ 232 13
	07/14/03	Mobil	P O. Box 4773	Carol Stream	IL	60197	Candidate gas	\$ 140.93
	08/01/03	Mobil	P O Box 4773	Carol Stream	IL	60197	Candidate gas	\$ 284.14
	07/14/03	Amoco		Des Moines	IA	50360	Campaign gas	\$ 750 00
	07/14/03	Citgo	P O. Box 29209	Mission	KS	66201	Campaign gas	\$ 450 00
	07/12/03	Kinkos	654 W Washington Avenue	Madison	WI	53703	Print bill	\$ 216 79
	07/22/03	NCDS	124 5th Avenue S	La Crosse	WI	54601	Consulting, design	\$ 550 00
	10/09/03	Magnus	120 E. Wilson Street	Madison	WI	53703	Ticket	\$ 75 00
	07/26/03	Juniper Bank Master Card	P.O. Box 13337	Philadelphia	PA	19101	GOP Convention Expense	\$ 1,982.00
	07/26/03	Milwaukee County Board	901 N 9th Street	Milwaukee	WI	53233	Golf Outing Ticket	\$ 55 00
	07/26/03	American Express	P O Box 650448	Dallas	TX	75265	June Candidate Travel	\$ 1,940.00
	07/20/03	Century Tel	P.O. Box 6000	Marion	LA	71260	Telephone Charges	\$ 322 26
	07/31/03	Jeanne Welch	P.O. Box 523	Redgranite	WI	54970	Office Management, Consulting	\$ 6,500 00
	08/05/03	Foxfire	201 Foxfire Drive	Waupaca	WI	54981	Fundraiser expenses	\$ 342 35
	08/06/03	Tricia Sieg	2316 Badger Parkway Apt 11	Madison	WI	53713	Reimburse fundraiser expenses	\$ 54 60
	08/18/03	Old Hickory Country Club	7596 Highway 33E	Beaver Dam	WI	53916	Ticket	\$ 70 00
	08/20/03	6th District GOP	1808 Ohio Street	Oshkosh	WI	54902	Host event fee	\$ 75.00
	08/29/03	Republican Party of WI	P.O. Box 31	Madison	WI	53701	Purchase district list	\$ 9,000 00

	09/10/03	Republican Party of WI	P.O. Box 31	Madison	WI	53701	Registration for convention	\$	130.00
	07/31/03	Robert Welch	P.O. Box 523	Redgranite	WI	54970	Reimburse postage	\$	1,500.00
	09/29/03	Welch for Wisconsin	P.O. Box 28412	Milwaukee	WI	53226	Contribution	\$	1,000.00
	11/20/03	IBA	1400 E. Washington Street	Madison	WI	53703	Ticket	\$	20.00
	12/01/03	Brown County GOP	P.O. Box 1028	Green Bay	WI	54305	Contribution	\$	30.00
	10/02/03	Bush '04	P.O. Box 10648	Arlington	VA	22210	Dinner Ticket	\$	1,000.00
	08/04/03	Abella	2302 W. Badger Road	Madison	WI	53713	Radio Ad	\$	94.43
	08/04/03	WTDY	2740 Ski Lane	Madison	WI	53713	Freeze Ad	\$	256.00
	08/04/03	Chris Newhouse	322 South Owen Drive	Madison	WI	53705	Freeze Ad Buy	\$	2,224.00
	08/05/03	WSAU	P.O. Box 2048	Wausau	WI	54402	Freeze Ad	\$	240.00
	08/05/03	Midwest Communication	P.O. Box 23333	Green Bay	WI	54305	Freeze Ad	\$	252.00
	08/05/03	WRIG	557 Scott Street	Wausau	WI	54403	Freeze Ad	\$	180.00
	08/05/03	WHDG	3616 Highway 47N	Rhineland	WI	54501	Freeze Ad	\$	210.00
	08/05/03	WDEZ	P.O. Box 2048	Wausau	WI	54402	Freeze Ad	\$	350.00
	08/20/03	Chris Newhouse	322 South Owen Drive	Madison	WI	53705	Freeze Ad Buy	\$	1,165.69
	08/20/03	Chris Newhouse	322 South Owen Drive	Madison	WI	53705	Consulting Fee	\$	3,000.00
X	07/01/03	James Connelly	9305 N. Valley Hill Road	Milwaukee	WI	53217	Event costs	\$	378.20

Wisconsin

# CAMPAIGN FINANCE REPORT

STATE OF WISCONSIN  
ELECTIONS BOARD  
03 JUL 17 AM 7:55  
RECEIVED

## COMMITTEE IDENTIFICATION

Name of Committee Citizens for Welch  
Address P.O. Box 523  
City, State, ZIP Redgranite, WI 54970  
WSEB # ID 101787

Please check if address is different than previously reported

NAME OF REPORT Jan 2003 X Continuing Pre-Primary 20 Spring Fall/Recal  
July 2002 Continuing Pre-election 20 Spring Fall/Recal

## SUMMARY OF RECEIPTS AND DISBURSEMENTS

Column A	Column B	YTD	Audited Totals
This Period	Column B	YTD	Audited Totals
1. RECEIPTS			
A Contributions including Loans from Individuals	\$ 41,795 75		
B Contributions from Committees (Transfers-In)	\$ 1,575 00		
C Other Income and Commercial Loans	\$ -		
TOTAL RECEIPTS (Add totals from 1A, 1B, and 1C)	\$ 43,370 75	\$ -	

## 2. DISBURSEMENTS

A Gross Expenditures	\$ 15,284.04		
B Contributions to Committees (Transfers-Out)	\$ -		
TOTAL DISBURSEMENTS (Add totals from 2A and 2B)	\$ 15,284.04	\$ -	

## CASH SUMMARY

Cash Balance at Beginning of Report	\$ 74,019.93		
Total Receipts	\$ 43,370 75		
Subtotal	\$ 117,390 68		
Total Disbursements	\$ 15,284 04		
CASH BALANCE AT END OF REPORT	\$ 102,106.64		
INCURRED OBLIGATIONS (at close of period)	\$ -		
LOANS (at close of period)	\$ -		

I certify that I have examined this report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Candidate or Treasurer

Robert Welch

Signature of Candidate or Treasurer

Date

7-16-03

Daytime Phone

608-266-0751

NOTE The information on this form is required by ss 11 06, 11 20, Wis Stats

Failure to provide this information may subject you to the penalties of ss 11 60, 11 62, Wisconsin Stats

AM  
101787

# Citizens for Welch

SCHEDULE 1-A Contributions Including Loans from Individuals

IN- D	KIN CON DUT	DATE	LAST	FIRST	ADDRESS	CITY	ST	ZIP	OCCUPATION	EMPLOYER NAME	EMPLOYER ADDRESS	AMOUNT	YTD
	X	02/07/03	Gonzales	Charles	2271 Stonehaven Drive	Sun Prairie	WI	53590	State Political Liaison	American Transmission Company	N19 W299 Ridgeview Parkway W; Waukesha, WI 53188	\$ 189.00	\$ 189.00
	X	02/07/03	Williamson	Mark	82 Torstad Glen	Madison	WI	53711	Vice President	American Transmission Company	N19 W299 Ridgeview Parkway W, Waukesha, WI 53188	\$ 350.00	\$ 350.00
		03/06/03	Nelson	Todd	1431 Wisconsin Dells Parkway	Wisconsin Dells	WI	53965	Owner	Kalahari Resort	1305 Kalarahi Drive, P O Box 590; Wisconsin Dells, WI 53965	\$ 200.00	\$ 200.00
		03/06/03	Diehl	Thomas	560 Wisconsin Dells Parkway	Wisconsin Dells	WI	53965	President	Tommy Bartlett Inc.	560 Wisconsin Dells Parkway; Wisconsin Dells, WI 53965	\$ 200.00	\$ 200.00
		03/06/03	Moon	Carolyn	E12142 County T	Baraboo	WI	53913				\$ 100.00	\$ 100.00
		03/06/03	Van Wie	Joanne	1018 Weber Avenue	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
		03/06/03	Wojnicz	Edward	1497 Pleasant View Drive	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
		03/06/03	Byrski	Paul	P O Box 70	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
		03/06/03	Olson	Jack	834 Meadow Lane	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00

$\frac{d}{dt} \left( \frac{\partial L}{\partial \dot{x}} \right) = \frac{\partial L}{\partial x}$

6

03/06/03	Trumble	Kelli	49 Bowman Road	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
03/06/03	Kriesku	Kristi	610 Viking View Drive	Reedsburg	WI	53959				\$ 100.00	\$ 100.00
03/06/03	Wimmer	Jeff	P.O. Box 479	Lake Delton	WI	53940				\$ 100.00	\$ 100.00
03/06/03	Tollaksen	Peter	575 Wisconsin Dells Parkway	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
03/06/03	Gussel	Joyce	P.O. Box 177	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
03/06/03	Mor	Darrel	23 Kansas Avenue	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
03/06/03	Borcher	Arnold	333 Glenwood Lane	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
03/06/03	Gerdman	Gilbert	1401 Crawford Street	Baraboo	WI	53913				\$ 100.00	\$ 100.00
03/06/03	Lincoln	John	N67W31219 Club Circle W	Hartland	WI	53029				\$ 100.00	\$ 100.00
03/06/03	Shea	Verne	1608 Pleasantview Drive	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
03/06/03	Pine	Steven	N480 Highway 12	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
03/06/03	Schmitz	Mark	P.O. Box 745	Lake Delton	WI	53940				\$ 100.00	\$ 100.00
03/06/03	Helland	Patnck	N8943 Winnebago Drive	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
03/06/03	Wolfram	Tory	578 State Road 23	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
03/06/03	Gantz	Daniel	E10002 County Road P	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
03/06/03	Gantz	Timothy	501 E. Lake Avenue	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
03/06/03	Tofson	Tim	991 S Grouse Lane	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
03/06/03	Lucke	Tom	801 Meadow Lane	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
03/06/03	Nagel	Robert	P.O. Box 580	Lake Delton	WI	53940				\$ 100.00	\$ 100.00
03/06/03	Berneking	Joseph	853 County Road Hi: 3	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00

	03/06/03	Gavinski	Daniel	P O Box 117	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
	03/06/03	Borcher	Ben	49 Bowman Road	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
	03/06/03	Schultz	Pat	P O Box 15	Lake Delton	WI	53940				\$ 100.00	\$ 100.00
	03/06/03	Kaminski	Frank	P.O. Box 130	Lake Delton	WI	53940				\$ 100.00	\$ 100.00
	03/06/03	Leonhardt	Dennis	S1196 Highway A	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
										400 Wisconsin Dells Parkway, Wisconsin Dells, WI 53965		
	03/06/03	Makowski	Richard	400 Wisconsin Dells Parkway	Wisconsin Dells	WI	53965	Resort Owner	American World, Inc.		\$ 100.00	\$ 100.00
	03/06/03	Helland	Peter	816 Meadow Lane	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
	03/06/03	Holzem	Brian	P O Box 146	Wisconsin Dells	WI	53965				\$ 100.00	\$ 100.00
	03/06/03	Clausen	Doug	627 Lakeview Court	Wisconsin Dells	WI	53965				\$ 50.00	\$ 100.00
	03/07/03	Kujawa	John	308 Memorial Drive	Berlin	WI	54923	President	Wisconsin Farmers & Merchants Bank & Trust	123 West Huron Street, Berlin, WI 54923	\$ 250.00	\$ 250.00
	03/07/03	Beck	John	4107 W. Rudella Road	Mequon	WI	53092				\$ 100.00	\$ 100.00
	03/07/03	Schindhelm	R.M	9366 County H	Fremont	WI	54940				\$ 20.00	\$ 20.00
	03/07/03	Galke	Milton	21435 W. Lochleven Lane	New Berlin	WI	53146				\$ 15.00	\$ 15.00
	03/07/03	Wagner	Becky	N1173 County Road Y	Wautoma	WI	54982				\$ 25.00	\$ 25.00
	03/07/03	Kreunen	Rodney	305 Yosemite Trail	Madison	WI	53705				\$ 20.00	\$ 20.00
	03/07/03	Gaboury	Jack	9407 West Hope Avenue	Wauwatosa	WI	53222				\$ 50.00	\$ 50.00

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	03/19/03	Huegel	W M	6660 N. River Road	Glendale	WI	53217					\$ 25.00	\$ 25.00
	03/19/03	Saeger	Frank	2722 Raymond Road	Franksville	WI	53126					\$ 5.00	\$ 5.00
	03/19/03	Erickson	Michael	P O Box 74	Elroy	WI	53929	Construction operator	Erickson Quarries, Inc.	P.O. Box 74, Elroy, WI 53929		\$ 100.00	\$ 100.00
	03/19/03	McDermott	Scott	S27 W29517 Jarmon Road	Waukesha	WI	53188					\$ 50.00	\$ 50.00
	03/19/03	Berg	Kenneth	5311 N. Santa Monica Blvd.	Whitefish Bay	WI	53217					\$ 20.00	\$ 20.00
	03/19/03	Benning	Audrey	780 Pilgrim Parkway, Suite B	Elm Grove	WI	53122					\$ 10.00	\$ 10.00
	03/19/03	Smith	Walter	102 Fourth Avenue	Baraboo	WI	53913					\$ 50.00	\$ 50.00
	03/19/03	Brakebush	William	W7266 Fern Road	Oxford	WI	53952	Business Manager	Brakebush Brothers Inc.	N4993 6th Drive, Westfield, WI 53964		\$ 250.00	\$ 250.00
	03/19/03	Steidl	Robert	P.O. Box 166	Waupaca	WI	54981					\$ 100.00	\$ 100.00
	03/19/03	Murray	Hyde	N1191 Chalet Drive	Waupaca	WI	54981	Attorney	Omholt and Forsythe	105 Pine Crest Lane, Iola, WI 54945		\$ 50.00	\$ 50.00
	03/19/03	Selsing	John	120 E. Huron Street	Berlin	WI	54923	Attorney	John B. Selsing, Attorney at Law	120 E. Huron Street, Berlin, WI 54923		\$ 100.00	\$ 100.00
	03/19/03	Berlowski	Eugene	373 NW Cumberland	Berlin	WI	54923					\$ 100.00	\$ 100.00
	03/19/03	Tillmann	Cynthia	1934 Maple Road	Grafton	WI	53024					\$ 100.00	\$ 100.00
	03/19/03	Dwyer	David	N9629 Kuhn Road	Portage	WI	53901					\$ 50.00	\$ 50.00
	03/19/03	Zimpel	Robert	P.O. Box 304	Plainfield	WI	54966					\$ 100.00	\$ 100.00
	03/19/03	Lombard	Andrea	509 2nd Avenue	Baraboo	WI	53913					\$ 50.00	\$ 50.00
	03/19/03	Schafer	Gordon	5154 178th Street	Chippewa Falls	WI	54729					\$ 100.00	\$ 100.00
	03/19/03	Pavelski	Richard	9390 Konkol Lane	Amherst Junction	WI	54407					\$ 100.00	\$ 100.00

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							678 Riverbend Lane	Laurence			Princeton	WI	54968							\$	100.00	\$	100.00	
		03/26/03	Trotter				5401 Highway K	Bruce			Hartford	WI	53027								\$	40.00	\$	40.00
		03/26/03	Gauerke				N2711 Browne Lane	Daniel			Waupaca	WI	54981								\$	50.00	\$	50.00
							1909 Jefferson Street											101 Third Avenue, Baraboo, WI 53913						
	X	03/26/03	Lindner			Greg					Baraboo	WI	53913	President		The Baraboo National Bank					\$	250.00	\$	250.00
							P O Box 50	Merlin			Baraboo	WI	53913	CEO & Chairman		The Baraboo National Bank					\$	250.00	\$	250.00
		03/26/03	Zitzner				E6498 County Road N									Manawa Telephone Company	P.O. Box 130, Manawa, WI 54949							
	X	04/17/03	Squires			Tom					Manawa	WI	54949	President							\$	100.00	\$	200.00
							166 North Clinton Avenue									Wittenberg Telephone Company	P.O. Box 160, Wittenburg, WI 54499							
	X	04/17/03	Mahnke		Al						Cambridge	WI	52923	General Manager							\$	100.00	\$	100.00
																	3939 W Highland Blvd., Milwaukee, WI 53208							
	X	04/17/03	Terham		Susanne		6310 W. Cedar				Wauwatosa	WI	53213	PPI/BRQA		Miller Brewing Company					\$	50.00	\$	50.00
							13670 Park Circle S									Director Corp Operations Planning and Improvement								
	X	04/17/03	Fink		Robert						Elm Grove	WI	53122	Improvement		Miller Brewing Company					\$	50.00	\$	50.00
																Vice President-Information Systems								
	X	04/17/03	Zini		David		335 Sheffield Drive				Brookfield	WI	53005			Miller Brewing Company					\$	50.00	\$	50.00
							4585 Hewitts Point Road				Oconomowoc	WI	53066	Executive		U S. Counseling Services Inc	120 Bishops Way, Brookfield, WI 53008							
		04/17/03	Bluemke		Duane		W10857 Oak Street				New London	WI	54961								\$	250.00	\$	250.00
		04/17/03	Fuhrmann		Donn																\$	50.00	\$	50.00

		04/17/03	Schuster	Jerry	8454 Schuster Road	Berlin	WI	54923				\$ 25.00	\$ 25.00
		04/17/03	Carlson	Robert	508 S. Clifton Avenue	Park Ridge	IL	60068				\$ 25.00	\$ 25.00
		04/17/03	Schulte	Wayne	W6984 610th Avenue	Ellsworth	WI	54011				\$ 100.00	\$ 100.00
		04/17/03	Cauley	James	14130 W. Wisconsin Avenue	Elm Grove	WI	53122	Retired			\$ 100.00	\$ 100.00
		04/17/03	Klinker	Gary	33195 Horizon Avenue	Camp Douglas	WI	54618				\$ 25.00	\$ 25.00
		04/17/03	Cornellier	Larry	105 Dearborn Street	Beloit	WI	53511				\$ 100.00	\$ 100.00
		04/17/03	Kujawa	Paul	175 E. Noyes	Berlin	WI	54923				\$ 100.00	\$ 100.00
		04/17/03	Muscanero	Mike	S3824 County Road T	Baraboo	WI	53913				\$ 50.00	\$ 50.00
		04/17/03	Carl	Duwayne	820 Bridge Street	Manawa	WI	54949	Retired			\$ 100.00	\$ 100.00
		04/17/03	Werch	Melvin	325 E. Liberty Street	Berlin	WI	54923				\$ 50.00	\$ 50.00
		04/17/03	Grothman	James	2625 Hamilton Street	Portage	WI	53901	Land Surveyor	Grothman & Associates	625 E. Slifer Street, Portage, WI 53901	\$ 100.00	\$ 100.00
		04/17/03	McFarland	James	1133 E Pleasant Street, Apt. 206	Milwaukee	WI	53202				\$ 25.00	\$ 25.00
X		04/17/03	Burns	Jo Anne	80 River View Road	Kiel	WI	53042				\$ 25.00	\$ 25.00
		04/17/03	Ige	Daniel	W1671 Sandstone Road	Ripon	WI	54971	President	Ripon Community Credit Union	317 Stanton Street, Ripon, WI 54971	\$ 100.00	\$ 100.00
		04/17/03	Huth	Minam	W2128 Tuleta Hill Road	Markesan	WI	53946				\$ 30.00	\$ 30.00
		04/17/03	Brakebush	Carl	N4985 6th Drive	Westfield	WI	53964				\$ 100.00	\$ 100.00
X		04/17/03	Gleasant	Larry	1324 Williamson Street	Madison	WI	53703				\$ 50.00	\$ 50.00

	04/17/03	Artis	Kenneth	1 Langdon Street	Madison	WI	53703	Attorney	Department of Revenue	2135 Rimrock Road, Madison, WI 53713	\$ 150.00	\$ 150.00
	04/17/03	Harper	Hugh	S7073 Alkins Road	Readstown	WI	54652				\$ 50.00	\$ 50.00
	04/17/03	Herdeman	Henry	103 W20171 Kelsey Drive	Muskego	WI	53150	Owner/President	Herdeman Corp	5429 S Buckhorn Avenue, Cudahy, WI 53110	\$ 300.00	\$ 400.00
	06/09/03	Unitemized Contributions									\$ 1,220.00	\$ 1,220.00
	06/09/03	Squires	Robert	917 S Bridge Street	Manawa	WI	54949				\$ 100.00	\$ 100.00
	06/09/03	Harper	David	Box 93	Iola	WI	54945	Journalist	Krause Publications	700 E. State, Iola, WI 54945	\$ 100.00	\$ 200.00
	06/09/03	Maasch	Lloyd	208 W. Clark Street	Weyauwega	WI	54983	Retired Family Physician			\$ 100.00	\$ 100.00
	06/09/03	VanDeest	D.J	Box 191	Iola	WI	54945	Retired			\$ 500.00	\$ 500.00
	06/09/03	Diercks	Stephen	109 S Scott Street	Coloma	WI	54930				\$ 100.00	\$ 100.00
	06/09/03	Halpin	Michael	P O Box 162	Waupaca	WI	54981	President	Title One, Inc	P.O. Box 668; Waupaca, WI 54981	\$ 100.00	\$ 100.00
	06/09/03	Murray	Hyde	N1191 Chalet Drive	Waupaca	WI	54981	Attorney	Omholt and Forsythe	105 Pine Crest Lane, Iola, WI 54945	\$ 100.00	\$ 150.00
	06/09/03	Ort	Gary	E8299 Collier Road	New London	WI	54961	President/Owner	Wolf River Lumber	P.O. Box 224, New London, WI 54961	\$ 250.00	\$ 500.00
	06/09/03	Wagner	Richard	E5846 Hillside Drive	Weyauwega	WI	54983				\$ 50.00	\$ 50.00





X	06/09/03	Sharp	Richard	501 Rivergate Drive	Richmond	VA	23233	Retired				\$ 100.00	\$ 100.00
X	06/09/03	Sharp	Sherry	501 Rivergate Drive	Richmond	VA	23233	Retired				\$ 100.00	\$ 100.00
X	06/09/03	Mitchell	George	5250 N. Kimbark Place	Whitefish Bay	WI	53217	Consultant	The Mitchell Company	2025 N Summit Avenue; Milwaukee, WI 53202		\$ 100.00	\$ 100.00
X	06/09/03	Fuller	Howard	3290 N 44th Street	Milwaukee	WI	53216	Educator	Marquette University	750 N. 18th Street; Milwaukee, WI 53202		\$ 100.00	\$ 100.00
X	06/09/03	McGriff	Deborah	3290 N. 44th Street	Milwaukee	WI	53216	Educator	Edison Schools	521 Fifth Avenue, New York, NY 10175		\$ 100.00	\$ 100.00
X	06/09/03	Zigman	Lynette	15285 Leland Drive	Brookfield	WI	53005	Partner	Foley & Lardner	15285 Leland Drive; Brookfield, WI 53005		\$ 200.00	\$ 200.00
	06/09/03	Hird	Lyle	5822 Barton Road	Madison	WI	53711	Retired				\$ 50.00	\$ 50.00
	06/09/03	Butter	Roy	2034 E. Glendale Avenue	Milwaukee	WI	53211					\$ 50.00	\$ 50.00
X	06/09/03	Anderson	Loren	W5549 Plantation Road	Elkhorn	WI	53121	President	Memorial Hospital Corporation of Burlington	252 McHenry Street, Burlington, WI 53105		\$ 250.00	\$ 250.00
X	06/09/03	Erickson	Lief	111 N. Maple Lane	Burlington	WI	53105	President	Aurora Health Care South Region	248 McHenry Street; Burlington, WI 53105		\$ 250.00	\$ 250.00
X	06/09/03	Howe	Ed	15100 Briaridge Court	Elm Grove	WI	53122	President/CEO	Aurora Health Care	3000 West Montana; Milwaukee, WI 53215		\$ 500.00	\$ 500.00

X	06/09/03	Huxley	Eliot		9287 N. Waverly Drive	Milwaukee	WI	53217	President	Aurora Medical Group	3000 W Montana Avenue, Milwaukee, WI 53215	\$ 250.00	\$ 250.00
X	06/09/03	Turkal	Nick		4870 N. Bartlett Avenue	Whitefish Bay	WI	53217	Sr Clinical Vice President	Aurora Health Care	3000 W. Montana Avenue, Milwaukee, WI 53215	\$ 250.00	\$ 250.00
X	06/09/03	Ambrosius	Mark		2424 S. 92nd Street	West Allis	WI	53227	President, Metro Region	Aurora Health Care	3000 W Montana Avenue, Milwaukee, WI 53215	\$ 250.00	\$ 250.00
X	06/09/03	Koehler	Tom		4373 Nicolet Drive	Green Bay	WI	54311	President	Aurora BayCare Medical Center	2845 Greenbriar Road, Green Bay, WI 54311	\$ 250.00	\$ 250.00
X	06/09/03	Schwartz	Mark		W210 N11165 Mountbrooke Drive	Germanatown	WI	53022	Administrator	Aurora Medical Center of Washington County	1032 East Sumner Street, Hartford, WI 53027	\$ 100.00	\$ 100.00
X	06/09/03	Walsh	Lorelle		4532 W. Squire Road	Mequon	WI	53092	Sr. V.P Human Resources	Aurora Health Care	3000 W Montana Avenue, Milwaukee, WI 53215	\$ 100.00	\$ 100.00
	06/09/03	Plooster	Chris		E11451 Birnam Woods Road	Baraboo	WI	53913				\$ 100.00	\$ 100.00
	06/09/03	Weiss	Beatrice		N1507 State Highway 22	Montello	WI	53949				\$ 25.00	\$ 25.00
	06/09/03	Higgins	Tim		909 Cambridge Court	Appleton	WI	54915				\$ 25.00	\$ 25.00
	06/09/03	Viste	Kenneth		100 Stoney Beach Road	Oshkosh	WI	54901	Physician	LakesideNeuro care		\$ 100.00	\$ 100.00
	06/09/03	Waiske	K.G		522 Fairview Avenue	Ripon	WI	54971	Insurance Agent	New England Financial	Box 2040, Ripon, WI 54971	\$ 50.00	\$ 50.00
	06/09/03	Sauey	Craig		212 10th Avenue	Baraboo	WI	53913				\$ 100.00	\$ 100.00

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	06/09/03	Ward	Sharon	1979 S. 15th Street	Milwaukee	WI	53204					\$ 100.00	\$ 100.00
	06/09/03	Hall	Jack	N7265 Shacks Road	Mauston	WI	53948	Owner	Shipwreck Bay	N7265 Shacks Road; Mauston, WI 53948		\$ 500.00	\$ 500.00
	06/09/03	Emmer	Wayne	906 S. 15th Street	Sheboygan	WI	53081					\$ 100.00	\$ 100.00
	06/09/03	Cafilisch	Neil	124 Fourth Avenue	Baraboo	WI	53913	Tavern Owner	Square Tavern	124 4th Avenue; Baraboo, WI 53913		\$ 150.00	\$ 150.00
	06/09/03	Sprenger	Robert	P O. Box 312	Marion	WI	54950	Proprietor	Bubba's	121 N. Main Street, Marion, WI 54950		\$ 500.00	\$ 500.00
	06/09/03	Raught	Patricia	Yukon Trail	Tomahawk	WI	54487	Owner	Pat-Rick's Country Inn	1203 State Highway 13; Tomahawk, WI 53934		\$ 500.00	\$ 500.00
	06/09/03	Hinderman	Gerald	114 West Clay Street	Cuba City	WI	53807	Owner	Green House Tavern	3544 County Highway HH, Kieler, WI 53812		\$ 300.00	\$ 300.00
	06/09/03	Schulz	Nancy	26008 31st Street	Salem	WI	53168	Owner	Jeddy's Bar	1660 240th Avenue; Kansasville, WI 53139		\$ 250.00	\$ 250.00
	06/09/03	Fisher	Billi	4226 W Lake George Road	Rhineland	WI	54501					\$ 100.00	\$ 100.00
	06/09/03	Machut	Wayne	3009 41st Street	Two Rivers	WI	54241					\$ 100.00	\$ 100.00
	06/09/03	Cafilisch	Neil	124 Fourth Avenue	Baraboo	WI	53913	Tavern Owner	Square Tavern	124 4th Avenue, Baraboo, WI 53913		\$ 150.00	\$ 300.00
	06/09/03	Curtis	Michael	316 Heidelberg Court	Green Bay	WI	54302	Owner	Nineteenth Hole	1647 Cass, Green Bay, WI 54302		\$ 400.00	\$ 400.00

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W2860 US Hwy 10

	06/09/03	Dahlen	Nancy	W2860 US Hwy 10	Granton	WI	54436	Owner		Tommy's Hilltop Tavern	W2860 US Highway 10, Granton, WI 54436	\$ 500.00	\$ 500.00
	06/09/03	Lendved	Connie	927 Jackson Street	Little Chute	WI	54140	Owner		Bear's Den	130 S Main Street, Clintonville, WI 54929	\$ 250.00	\$ 250.00
	06/09/03	Skibbie	Joe	5920 Highway K	Conover	WI	54519					\$ 20.00	\$ 20.00
	06/09/03	Skewes	Denise	6110 Old Middleton Road	Madison	WI	53705	Registered Nurse		UW Hospital	600 Highland Avenue, Madison, WI 53792	\$ 500.00	\$ 500.00
	06/09/03	Culver	Lea	N834 Club Circle Drive	Prairie du Sac	WI	53578					\$ 100.00	\$ 100.00
	06/09/03	Johnson	Julie	S2937 Birdie Court	Reedsburg	WI	53959					\$ 100.00	\$ 100.00
	06/09/03	Miller	Glenn	3597 E. Buckatabon Road	Conover	WI	54919					\$ 20.00	\$ 20.00
	06/09/03	Zdroh	Tony	3973 Cloverland Drive	Eagle River	WI	54521					\$ 20.00	\$ 20.00
	06/09/03	DePue	Terry	8003 Lost Lake Drive N	St Germain	WI	54558					\$ 20.00	\$ 20.00
	06/09/03	Jankers	Tommy	2018 Highway 45 N	Eagle River	WI	54521					\$ 20.00	\$ 20.00
X	06/23/03	Beck	Jeff	373 Overland Trail	Oshkosh	WI	54904	Executive		Amercable	6076 Lake Road, Oshkosh, WI 54902	\$ 235.00	\$ 235.00
X	06/23/03	Steichen	Bob	P O Box 8	Bonduel	WI	54107	Executive		Bonduel Cable	120 S. Church Street; Bonduel, WI 54107	\$ 200.00	\$ 200.00
X	06/23/03	Ryan	Robert	403 Venture Court, No 1	Verona	WI	53593			HLM Cable Corp		\$ 65.00	\$ 65.00
X	06/23/03	Baeten	Scott	305 N. 10th Street	De Pere	WI	54115	Ryan Funeral Home				\$ 100.00	\$ 100.00

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	06/23/03	Gray	David	733 Newbury Street	Ripon	WI	54971					\$ 50.00	\$ 50.00
	06/23/03	Lind	William	W3748 Oak Street	Montello	WI	53949					\$ 100.00	\$ 100.00
	06/23/03	Lyke	Audrey	621 Hillside Terrace	Ripon	WI	54971					\$ 25.00	\$ 25.00
	06/23/03	McConnell	Lynn	N8615 Old 49 Road; P.O. Box 129	Berlin	WI	54923					\$ 100.00	\$ 100.00
	06/23/03	Minch	Gordon	961 S. Grove Street	Ripon	WI	54971					\$ 100.00	\$ 100.00
	06/23/03	Ramos	Sharon	859 Nordane Avenue	Ripon	WI	54971					\$ 20.00	\$ 20.00
	06/23/03	Reiser	Robert	114 Stoney Ridge Road	Ripon	WI	54971					\$ 100.00	\$ 100.00
	06/23/03	Weir	Dennis	526 Watson Street	Ripon	WI	54971					\$ 100.00	\$ 100.00
	06/23/03	Weiske	K.G.	522 Fairview Avenue	Ripon	WI	54971		Insurance Agent	New England Financial	Box 2040, Ripon, WI 54971	\$ 100.00	\$ 150.00
	06/23/03	Wuest	Timothy	W816 Brooklyn J	Ripon	WI	54971					\$ 50.00	\$ 50.00
	06/23/03	Huck	Clifford	23605 Golf Road	Kansasville	WI	53139					\$ 50.00	\$ 50.00
	06/23/03	Snider	John	406 E. Lake Street	Waupaca	WI	54981					\$ 25.00	\$ 25.00
	06/23/03	Petri	Rick	5134 Reynolds Avenue	Waunakee	WI	53597		Murphy Desmond, S.C.		2 E Mifflin Street, Madison, WI 53701	\$ 100.00	\$ 200.00
	06/23/03	Welch	Betty	County Highway EE, P O Box 248	Redgranite	WI	54970		Attorney			\$ 100.00	\$ 100.00
	06/23/03	Delgado	Jose	12900 W North Avenue	Brookfield	WI	53005		President/CEO	American Transmission Company	N19 W299 Ridgeview Parkway W; Waukesha, WI 53188	\$ 100.00	\$ 100.00
	06/23/03	Forsythe	David	P.O. Box 922	Manawa	WI	54949		Attorney			\$ 100.00	\$ 100.00
	06/23/03	Wandtke	Denis	101 Spring Street	Ogdensburg	WI	54962					\$ 100.00	\$ 100.00
	06/23/03	Gilles	Donald	683 Leighton Road	Waupaca	WI	54981					\$ 100.00	\$ 100.00
	06/23/03	Meyer-Blum	Kathryn	E1684 Nelson Road	Iola	WI	54945					\$ 100.00	\$ 100.00

	06/23/03	Mishler	Clifford	100 Island Drive; P O. Box 316	Iola	WI	54945					\$ 100.00	\$ 100.00
	06/23/03	Bauman	Kurt	421 Griswold Street	Ripon	WI	54971					\$ 50.00	\$ 50.00
	06/23/03	Rodensal	Bernard	W2189 Dakota Avenue	Berlin	WI	54923					\$ 100.00	\$ 100.00
	06/23/03	Crawford	James	P O. Box 532	Portage	WI	53901					\$ 100.00	\$ 100.00
	06/23/03	Reinsch	Thomas	N4593 Horner Road	Ripon	WI	54971					\$ 100.00	\$ 100.00
										1110 Dartford; Ripon, WI 54971			
	06/23/03	Washkovick	Roger	1110 Dartford Road	Ripon	WI	54971	President	R&R Wash Materials			\$ 300.00	\$ 300.00
	06/23/03	Terbilcox	William	136 Woverton Avenue	Ripon	WI	54971					\$ 50.00	\$ 50.00
	06/23/03	Bauman	Kraig	W14251 Highland Terrace	Ripon	WI	54971					\$ 100.00	\$ 100.00
	06/23/03	Diedrich	John	W13855 Skyline Circle	Ripon	WI	54971					\$ 50.00	\$ 50.00
	06/23/03	Burch	Michael	W4821 Meiklejohn Drve	Fond du Lac	WI	54935					\$ 100.00	\$ 100.00
	06/23/03	Mueller	N.D.	2060 Omro Road	Oshkosh	WI	54904					\$ 100.00	\$ 100.00
	06/23/03	Moody	David	W2253 Highway 23	Mount Calvary	WI	53057					\$ 100.00	\$ 100.00
	06/23/03	Lungwitz	Delons	N2171 County Road E	Redgranite	WI	54970					\$ 100.00	\$ 100.00
	06/23/03	Rockwood	John	513 Woodside Avenue	Ripon	WI	54971					\$ 100.00	\$ 100.00
	06/23/03	Rikkers	Helga	1100 Newbury Street	Ripon	WI	54971					\$ 100.00	\$ 100.00
	06/23/03	Rodensal	Barry	W1766 Dead End Road	Berlin	WI	54923					\$ 100.00	\$ 100.00
	06/23/03	Bumby	Christopher	836 Thomas Street	Ripon	WI	54971					\$ 100.00	\$ 100.00
	06/23/03	Trecek	Vernon	P O Box 540	Portage	WI	53901					\$ 100.00	\$ 100.00
	06/23/03	Fix-Romlow	Jeanne	W11344 Bay Drive	Lodi	WI	53555					\$ 100.00	\$ 100.00
	06/23/03	Peck	Alfred	592 South Street	Green Lake	WI	54941					\$ 100.00	\$ 100.00

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1

# Citizens for Welch

## SCHEDULE 1-B

[illegible]

# Citizens for Welch

## Gross Expenditures

SCHEDULE 2-A

IN-KIND	DATE	NAME	ADDRESS	CITY	ST	ZIP	PURPOSE	AMOUNT
	01/07/03	Redgranite Cwik Mart	900 E Bannerman Avenue	Redgranite	WI	54970	Candidate gasoline	\$ 20 94
	02/23/03	CITGO	P O Box 29209	Mission	KS	66201	Candidate gasoline	\$ 607 70
	04/03/03	AMOCO		Des Moines	IA	50360	Candidate gasoline	\$ 916 91
	06/14/03	AMOCO		Des Moines	IA	50360	Candidate gasoline	\$ 572 33
	01/07/03	US Cellular	P.O. Box 0203	Palatine	IL	60055	Candidate phone	\$ 509 70
	04/03/03	US Cellular	P.O. Box 0203	Palatine	IL	60055	Candidate phone	\$ 527 61
	03/10/03	Century Tel	P O Box 6000	Marrón	LA	71260	Candidate phone	\$ 470 90
	05/04/03	Mobile	P O Box 4773	Carol Stream	IL	60197	Candidate gasoline	\$ 1,046 95
	01/20/03	Michelle Newhouse	322 S. Owen Drive	Madison	WI	53705	Reimbursement for printing expenses	\$ 1,600 00
	01/20/03	Sauk County Economic Development Corporation	P O Box 33	Baraboo	WI	53913	Economic development dinner	\$ 20 00
	01/20/03	Juniper Bank Master Card	P O Box 13337	Philadelphia	PA	19101	Candidate travel	\$ 475 00
	01/20/03	Republican Party of Wisconsin	P O. Box 31	Madison	WI	53701	Purchase lists	\$ 3,400.00
	01/27/03	Master Card	P O. Box 15019	Wilmington	DE	19886	Candidate trip	\$ 254 12
	04/03/03	Juniper Bank Master Card	P O Box 13337	Philadelphia	PA	19101	Candidate trip to Washington, D.C	\$ 532 50
	02/11/03	Kratt Associates	1750 N. Palmer	Milwaukee	WI	53212	Fundraising fee	\$ 1,259 00
	04/03/03	American Express	P O Box 650448	Dallas	TX	75265	Candidate meals and gas	\$ 471 79
	04/15/03	Econoprint	330 Locust Drive	Verona	WI	53593	Printing fundraising invites	\$ 440 54
	05/01/03	Wisconsin Right to Life	10625 W. North Avenue	Milwaukee	WI	53226	Dinner ticket	\$ 60 00
	05/04/03	Tom's Auto Care	200 Bannerman Avenue	Redgranite	WI	54970	Campaign vehicle maintenance	\$ 68 41
	05/10/03	Tricia Sieg	2316 Badger Parkway	Madison	WI	53713	Decorations for convention	\$ 75 62
	05/04/03	American Express	P.O. Box 650448	Dallas	TX	75265	Campaign team meal	\$ 792 82
	05/10/03	Econoprint	27 S Pinckney Street	Madison	WI	53703	Convention printing	\$ 503 09
	05/10/03	Holiday Inn	101 N Point Drive	Stevens Point	WI	54481	Convention reception room rental	\$ 170 36
	06/28/03	Robert Welch	P O Box 523	Redgranite	WI	54970	Reimburse postage expense	\$ 200.00
X	06/16/03	Jerry Long	66 Wa Wa Avenue	Ripon	WI	54971	Food and drink for a fundraiser	\$ 200 00
X	06/23/03	Paul Cunningham	326 Maple Avenue	Fond du Lac	WI	54935	Donation of pies for a fundraiser	\$ 87 75



Dear Fellow Wisconsin Republican,

This may be the most-important letter I will ever send to you or any other conservative Wisconsin Republican.

As you may know, I have launched a campaign to unseat the ultra-liberal Democrat Russ Feingold from the United States Senate.

And make no mistake: I can win this race.

But to do so, I will need to "link" as many pro-life, anti-tax, pro-liberty conservative GOP voters as possible into an "iron chain" that can overcome Senator Feingold's left-wing financial arsenal.

Which is why, in a way, this letter is a "chain of loyalty".

And frankly, whether or not I can defeat Russ Feingold in November...

... could depend on whether or not I can count on you today to join my chain of conservative Republican loyalty.

Please, let me explain.

When I decided to take on Russ Feingold, I knew from the beginning I faced a hard fight. After all, I don't have the support of the powerful, national liberal Democrat money and propaganda machine.

But, I do have something far more valuable...

... I have a principled conservative agenda that places the right-to-life, the right to free speech, the right to worship and the right to keep-and-bear arms ahead of the politically correct views of the wine and cheese circuit in Washington, D.C.!

This pro-family, pro-taxpayer, pro-liberty agenda is one that I know you and a majority of Wisconsin Republicans strongly agree with.

Which is what I mean by a "chain of loyalty"...

... and why I am counting on you and each and every other loyal conservative Republican I contact to rush my campaign a special gift of \$20, \$35, \$50, \$75, \$100 -- or more -- today.

Please, it is crucial that 100% of the people I contact respond today -- not 10%, or 50%, not even a 75% response will do.

Over, please. . .

You see, I do not have the resources today to write to all of Wisconsin's Republicans and hope that at least 10% or so respond.

Instead, I can only afford to write to the most-loyal and steadfast pro-family, anti-tax, pro-defense conservatives I know of...

... and hope that 100% of those I write to today respond.

So -- can I count on you not to break the chain?

If your answer is "NO", it will be much more difficult to unseat Russ Feingold and give our state a Senator who cares more about Wisconsin families than he does the liberal elite in Washington.

On the other hand, if your answer is "YES", you'll give me the ammunition I need to expose Russ Feingold and his pro-big government, anti-life, pro-tax, anti-family agenda -- and win in November.

It's just that simple.

You see, I don't have access to the millions of dollars that are at the disposal of an entrenched Washington insider like Russ Feingold.

And make no mistake: Despite his self-professed contempt for campaign funds, Russ Feingold has plenty of cash at his disposal!

But what I have is more important -- I have you and an "iron chain" of pro-life, pro-family, pro-free enterprise, pro-liberty, pro-defense conservatives behind me.

And frankly, if I can keep this chain linked for the duration of this campaign -- I know I will defeat Russ Feingold in November.

But, any break in the chain makes our chances much tougher.

Why?

Because after years inside the Washington, D.C. Beltway, Russ Feingold has access to the liberal establishment elite and their unlimited wealth and power.

And even though Mr. Feingold has betrayed the trust of families all across Wisconsin -- it is always tough to defeat an incumbent.

In fact, I will have to make clear to all Wisconsin voters the stark philosophical differences between Russ Feingold and me on the issues... and that's where you come in.

With your much-needed link in our conservative chain, I will let each and every Wisconsin Republican know that:

**\*\* I am fiercely committed to THE right-to-life, THE right-to-keep-and-bear arms and THE right-to-free-speech...**

... while Russ Feingold is for unlimited abortions, Draconian gun restrictions, anti-religious liberty, liberal judges and is co-author of the most anti-free speech bill ever to be passed into law -- the McCain/Feingold bill.

Next page, please.



- \*\* I am a passionate believer in the sanctity of marriage and our traditional Wisconsin family values...  
... while Russ Feingold is a prisoner of the politically correct, anti-family Washington and Hollywood special interests.
- \*\* I stand firmly against high taxes and have proved it over and over again in the State Senate (most recently with my "Property Tax Freeze" bill)...  
... while Russ Feingold never met a tax hike he didn't like, voted against the much-needed Bush tax cuts, and has refused to sign the "No New Taxes Pledge".
- \*\* I fully understand that government regulation strangles business, kills jobs and handcuffs the free market...  
... while Russ Feingold is for more government controls and less individual freedom.
- \*\* I am a strong supporter of the President and his leadership in the war on terror...  
... while Russ Feingold has consistently put partisan politics above national security (he was THE ONLY U.S. Senator to vote against giving the President the authority to take military action in Iraq).

In short, Russ Feingold is the "Howard Dean" of the U.S. Senate! He is, simply out-of-touch with Wisconsin families -- and with your help today, he will soon be out of the United States Senate!

Unlike Mr. Feingold, I will work with President Bush to:

- \*\* fully restore and defend our traditional family values;
- \*\* bring new jobs and business back to Wisconsin;
- \*\* further cut your taxes and federal regulations on business;
- \*\* wage a winning war against our terrorist enemies;
- \*\* fully support our men and women in uniform;
- \*\* develop a sensible energy policy; and
- \*\* confirm conservative judges to the federal courts who do not believe God, the flag and the Pledge of Allegiance are somehow "unconstitutional".

But again, I can't do any of this on my own.

In his last election, Russ Feingold outspent my good friend, Republican Mark Neumann by \$500,000 (\$4.3 million to \$3.8 million) and is expected to raise at least \$5 million this time around.

But, he won by a mere three percentage points (51%-48%) which means HE CAN be beaten -- IF -- I can raise a strong and sizable campaign war chest of my own.

No, it won't be easy. Nothing worthwhile ever is.

Over, please. . .

But, if true-blue conservatives across Wisconsin bond together in "an unbreakable chain" in support of my campaign -- from one end of Wisconsin to the next -- it can be raised.

That's what I mean by "a chain of loyalty".

And, that's why it is critical that you and 100% of the people I write to today respond with an emergency gift...

... not 10%, not 25%, not even 50% will do.

Only a 100% response will help build the campaign war chest I will need to overcome Mr. Feingold's political machine.

My friend, like my friends and allies, Governor Tommy Thompson and Congressman Mark Neumann, I have often been accused of being "too conservative" or "too rural" to raise money.

Well I wear my commonsense rural roots and my strong pro-life, anti-big government, pro-family, anti-tax, pro-defense, anti-regulation and pro-liberty values as a badge of honor!

And with your help, we can and will bring these values to the United States Senate in Washington.

So, please, do not break this "chain": Rush back your gift of \$20, \$25, \$50, \$100 or more today.

Thank you. God bless you. And God bless America.

Sincerely,



Bob Welch  
Wisconsin State Senator

P.S. You are a crucial part of an "iron chain" of loyal conservative Republicans I will need to defeat Russ Feingold in November. But, any break in this chain could mean six more years of the liberal Mr. Feingold. So please, again, don't break the chain: Send in your most-special campaign donation of \$20, \$25, \$50, \$75, \$100 or more today.

P.P.S. I have been endorsed by the Wisconsin Right to Life Committee PAC every time I have run for office. In contrast, Russ Feingold has repeatedly voted to allow unlimited abortions -- including partial birth abortions. The choice could not be more clear for anyone who cares about the unborn. I hope you agree, and that I can count on your "link" in our chain as I seek to replace Russ Feingold as your U.S. Senator this November.



# PERSONAL REPLY TO BOB WELCH



FROM:

[Redacted]

A-4520  
WN01

**WELCH**  
for Wisconsin

P.O. Box 26412  
Milwaukee, WI 53226  
www.WelchForWisconsin.com

Dear Senator Welch,

I will not break the "chain"!

I know your campaign to unseat Washington insider and big- government liberal Russ Feingold is going to need the full political and financial support of each and every true-blue, pro-life, pro-family, pro-Second Amendment, pro-taxpayer, pro-defense conservative Republican in Wisconsin.

Therefore, I am immediately rushing you a special, emergency donation of:

☐ \$4,000\*\*    ☐ \$2,000\*    ☐ \$1,000    ☐ \$500  
☐ \$250    ☐ \$150    ☐ \$100    ☐ \$50    ☐ Other \$ \_\_\_\_\_

Please make your check payable to: **Welch for Wisconsin.**

\*\* Maximum allowed by couple for primary

\* Maximum allowed by individual for primary

Please see other side for  
Important FEC information.

## CREDIT CARD INFORMATION:

To make your contribution by credit card, please fill in the information below.

Type of credit card ☐ Visa ☐ MasterCard ☐ American Express ☐ Discover

Credit Card Number: \_\_\_\_\_

Exp Date. \_\_\_\_\_ / \_\_\_\_\_ Amount \$ \_\_\_\_\_

Name on the card (please print): \_\_\_\_\_

Signature. \_\_\_\_\_

**OPTIONAL:** Dear Senator Welch -- please know I will also help your campaign by

- ☐ Displaying a bumper sticker on my car
- ☐ Distributing yard signs
- ☐ Hosting a fundraiser
- ☐ Calling voters on your behalf on and before both the Primary and General Elections
- ☐ Going door-to-door
- ☐ Working the polls on Primary Day
- ☐ Working the polls on Election Day
- ☐ Other \_\_\_\_\_

If there are any errors in your name and address, please write in the correct information below.

Name \_\_\_\_\_  
Address \_\_\_\_\_  
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### Welch Campaign: Hires Key Thompson Team Members 8/25/2003

Finance Operations Headed by Experienced Veterans, Volunteers

[Redgranite, Wis. .] United States Senate Candidate Wisconsin Senator Bob Welch, continuing to build his statewide campaign network, today announced 4 key members of his campaign finance operations, including former Governor Tommy G. Thompson's chief fundraiser

"I am excited to have these four experienced individuals on board to help raise the necessary funds to run a top-flight campaign," said Welch, who on July 20th became the first Republican to officially announce his challenge to eleven-year incumbent Senator Russ Feingold. "I know Wisconsin and I know the issues its families care about. My campaign will not rely predominantly on high-priced campaign consultants, but instead on the thousands of grassroots Republicans, Independents and conservative Democrats who will volunteer their time to help defeat Russ Feingold. But in order to raise enough voluntary contributions to effectively get our message out, we needed to bring on board experienced professionals."

Key members of the Welch campaign's finance operations include:

PHIL PRANGE, former chief fundraiser for former Governor Tommy G. Thompson, who will act as a general fundraising consultant

DAN MORSE, former finance director for the Republican Party of Wisconsin, who will help with direct mail fundraising and event planning

BRIDGET HAGERTY, a Republican fundraiser from Rhinelander, who will handle the daily finance operations and event planning.

JOHN HILLER, a Milwaukee-area developer and treasurer for Milwaukee County Executive Scott Walker's campaign, who will serve as treasurer for Welch for Wisconsin.

"Tommy Thompson ran the most successful Republican campaigns in Wisconsin history," said Welch. "Bringing on seasoned veterans from the Thompson operation adds to the momentum we've built over the last month."



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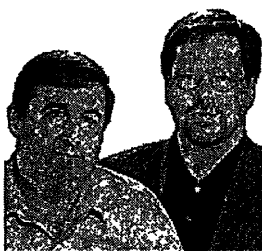
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## Welch keeps lid on U.S. account; state one gushes

Posted: April 14, 2004

**Spivak & Bice**

**Cary Spivak &  
Dan Bice**

E-MAIL | ARCHIVE

It sounds almost too good to be true.

State Sen. **Bob Welch** raised better than half a million dollars last year in his bid to challenge U.S. Sen. **Russ Feingold** this fall, yet his campaign paid staffers for its fund-raiser, **Gateway Ventures**, a mere \$1,400 in 2003.

How could a campaign spend so little to raise so much? Welch's folks chalk it up to being stingy with their checkbook.

"We're as frugal with our (campaign) expenditures as Bob is with Wisconsin's tax dollars," the Welch camp said in a statement issued earlier this year.

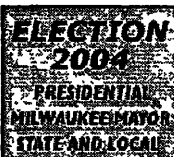
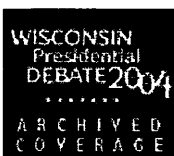
But look at Welch's state campaign account - which is supposed to be used only for helping him get elected to state offices - and you'll find something not mentioned in his press releases.

Gateway was paid \$29,000 for financial consulting by Welch's state fund in late July, just four days after the Redgranite Republican formally announced that he would be running for the right to take on Feingold. Gateway received another \$4,400 for expenses from the same state account the same month.

By January, Welch had drained his onetime six-figure state campaign fund down to a mere \$28,000.

All of which prompts an obvious question:

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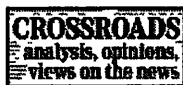
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Was Welch skirting election rules by using his state campaign dollars to pay the fund-raiser for his federal race - and then bragging about how he was holding down spending?

Not at all, says a key Welch adviser.

"Those two (campaign accounts) are completely separate," said **John Hiller**, treasurer for Welch's U.S. Senate run.

Hiller said the state payments to Gateway were for past consulting work for Welch's state fund. Also, he said, Welch's federal account recently paid the fund-raising firm \$27,500 for work on his U.S. Senate campaign.

A Federal Election Commission spokesman declined to talk about Welch's particular case, saying no complaint has been filed on the matter. But he said it is generally improper for a candidate to use money from a state fund to aid his federal campaign.

Welch's state and federal filings also raise other, smaller issues, including:

- His state campaign made a \$1,000 contribution to his federal fund last August. The FEC spokesman pointed to the rule banning transfers from a candidate's non-federal account to his primary federal one, but he had no comment on Welch's move.
- Welch's state fund paid his wife \$6,500 last year for consulting and office management, a much higher fee than it had paid her in the past. Two months later, she donated \$4,000 to her husband's federal campaign.

But those appear minor compared to the question about Welch's fund-raiser.

In an interview Wednesday, Hiller noted that Welch's state reports show the \$33,000 payment to Gateway was for past fund-raising advice given his state campaign between September 2002 and June 2003, a period during which Welch's state fund raised a total of \$67,000. That would mean 50 cents of every \$1 raised went to the consultant.

Not a very frugal use of campaign funds.

What's more, it's unclear why Welch needed a state fund-raising consultant early last year when he had already made it clear by then that he would be running for Feingold's slot.

As for Welch's campaign for the U.S. Senate, there's no doubt that Gateway - led by **Phil Prange**, ex-Gov. **Tommy Thompson's**



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longtime bagman - was shaking the money trees for Welch throughout the second half of last year.

Welch, who lost his previous bid for a U.S. Senate seat in 1994, put out a press release in August announcing that he had hired Prange & Co. for this task. Plus, campaign records show that several conduits sent checks for Welch's federal campaign to Gateway's offices in Madison starting last fall.

But Welch's federal reports for last year show only the single payment of \$1,387 to **Dan Morse**, who works with Prange, for "administrative/salary/overhead." The reports list no debts or obligations to Gateway in either its September or year-end reports.

Welch raised about \$520,000 for the U.S Senate contest last year. The longtime state legislator is running against businessmen **Russ Darrow** and **Tim Michels** in the GOP primary in September.

Hiller said it's true that Gateway was hired by Welch early on to help vacuum up campaign dough, but he declined to discuss details of that contract. He did say it was a performance-based contract, meaning Gateway gets paid when it meets certain goals.

A federal filing expected to be made public today, Hiller said, will show that Welch paid \$27,500 to Gateway in two payments during the first three months of this year.







As for the payments to the consultant from the state account last year, Hiller said he could not say much about those since he was not involved in Welch's state campaign. But he said he knew for certain that Welch wasn't guilty of mixing his campaign pots.

"No, not at all," Hiller said.

Even if it all sounds almost too good to be true.

From the April 15, 2004 editions of the Milwaukee Journal Sentinel

### **Cary Spivak & Dan Bice Archive**

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## Editorial: Welch needs to explain spending

An editorial  
April 18, 2004

From a political standpoint, state Sen. Bob Welch, R-Redgranite, remains the most credible contender for the Republican nomination to challenge popular Democratic Sen. Russ Feingold in November. Welch has built the best statewide organization, won a lot of key endorsements and raised more than half a million dollars to help fund his campaign.

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Unfortunately, from an ethical and legal standpoint, Welch's campaign faces questions about its credibility. According to federal spending reports for Welch's U.S. Senate campaign, the campaign paid only \$1,400 last year to Gateway Ventures, the fund-raising firm that helped him raise \$520,000. That's an extremely low expense for such a major service. Welch's campaign claimed the contender was simply "frugal." But it appears that may not be the case.

And if Welch is lying, it could cost him his shot at the Senate seat.

It turns out that, according to a Milwaukee Journal Sentinel investigation, Welch's state Senate campaign account paid Gateway \$29,000 for financial consulting last July, shortly after he announced his candidacy for Feingold's seat. Welch's state account also paid Gateway \$4,400 in expenses.

Here's the ethical and legal bind that Welch appears to have gotten himself into: In just about every instance, it is illegal to pay for federal campaign activities from a state account. There's a good reason for this distinction. Without it, candidates could use state campaign accounts to skirt federal election rules, and vice versa.

Welch's campaign treasurer, John Hiller, says the state and federal campaign accounts are completely separate. And he claims that the \$33,400 in payments to Gateway from the state account were for past fund-raising for Welch's state campaigns. But Welch has not faced a serious state race for years. And, for more than a year and a half, it has been exceedingly clear to everyone in Wisconsin politics that Welch is not running a state campaign.

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He has been running a federal campaign, for the U.S. Senate seat.

As the Welch campaign attempts to spin the story, the appearance is that the candidate has been emptying out his state account in order to pay for his federal race. If Welch can come up with a credible explanation for what looks to be financial shenanigans, he's safe politically. On the other hand, if he is lying, he's finished.

Even if Welch were to pay a fine and go on to win the Republican nomination, he would be severely burdened by lingering questions about questionable campaign practices. In a contest with Feingold, who with U.S. Sen. John McCain, R-Ariz., is a recognized national leader for clean elections and ethics in government, he wouldn't stand a chance.

That's why this is more than just an accounting debate. The Republican primary, in which Welch is one of four contenders, is less than five months away. The Federal Election Commission needs to investigate this matter quickly, and thoroughly. State officials should look into it from their end. Even before the investigations are done, Welch should explain precisely how he is paying for his U.S. Senate campaign.

Published: 5:33 AM 4/19/04

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